

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF TEXAS
LUFKIN DIVISION

IN RE:	§	
	§	
SAND HILL FOUNDATION, LLC,	§	CASE NO. 10-90209
	§	
SAND HILL PANOLA SWD #2 LLC,	§	CASE NO. 10-90210
	§	
SAND HILL PANOLA SWD #5, LLC,	§	CASE NO. 10-90211
	§	
DEBTORS	§	CHAPTER 11
	§	Joint Administration under #10-90209

**OBJECTION TO DEBTOR'S MOTION SEEKING EXTENSION OF EXCLUSIVITY
FOR TIME TO FILE PLAN AND DISCLOSURE STATEMENT**

Bass Drilling, Inc. ("Bass Drilling") files this Objection to the Debtor's Motion Seeking Extension of Exclusivity for Time to File Plan and Disclosure Statement (the "Motion") and would respectfully show the Court as follows:

1. Bass Drilling joins the Objection by the Official Committee of Unsecured Creditors (the "Committee") (see D.E. 198), on the same grounds and on the grounds listed below.

2. In addition, Sand Hill's ability to pay unsecured creditors depends to a great extent on the value of the two salt water disposal wells it owns. In its initial filings, the Debtor failed to state a reliable valuation of the wells. Instead, it apparently relied solely on number taken from a purchase offer received shortly before bankruptcy. While this offer is some indication of value, it is likely that the real value is higher. As a condition of any relief granted, the Committee should be permitted to obtain an independent valuation of the wells, to permit it and the remaining unsecured creditors to evaluate any plan prepared by the Debtor and to prepare their own plan, if need be.

3. The value of the debtor's construction and water disposal business is also in question.

For the same reasons, an examiner should be appointed to value Sand Hill itself.

Bass Drilling, Inc. respectfully requests that the relief requested in the Motion be denied and for such other and further relief to which it may be entitled.

Respectfully submitted,

PREIS & ROY, P.L.C.

/s/ David L. Pybus

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CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing have been forwarded to the following parties by electronic means:

Attorneys for Debtors

Jeffrey Wells oppel
1010 Lamar, Ste. 1420
Houston, TX 77002

John L. Whitehead
P.O. Box 1127
Natchitoches, LA 71458

U.S. Trustee

Timothy W. O'Neal
110 N. College Ave., Ste. 300
Tyler, TX 75702

Steven C. Haley
P.O. Box 1808
Brenham, TX 77834

Debtors:

Sand Hill Foundation, LLC
P.O. Box 1661
Center, TX 75935

Scott A. Richeson
Charles E. Lauffer, Jr.
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Tyler, TX 75701

Sand Hill Panola SWD #2
P.O. Box 1661
Center, TX 75935

R. Christopher Naylor
4801 Woodway, Ste. 420 W.
Houston, TX 77056

Sand Hill Panola SWD #5
P.O. Box 1661
Center, TX 75935

John Mayer
2 Riverway, Ste. 700
Houston, TX 77056

Parties Requesting Notice:

Andrew Dylan Wood
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Austin, TX 78716

Peter W. Ito
Kristen Jain
Megan Adeyemo
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Baton Rouge, LA 70821

Michael P. Ridulfo
1111 Bagby, 47th Floor
Houston, TX 77002

Michael E. Gazette
100 E. Ferguson St., Ste. 1000
Tyler, TX 75702

And to all parties on the attached List of Creditors Holding 20 Largest Unsecured Claims.

SIGNED AND DONE this 11th day of October 2010.

/s/ David L. Pybus
David L. Pybus

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SUPPLEMENTAL CERTIFICATE OF SERVICE:
BASS DRILLING'S OBJECTION TO DEBTOR'S MOTION SEEKING EXTENSION
OF EXCLUSIVITY FOR TIME TO FILE PLAN AND DISCLOSURE STATEMENT

On behalf of Bass Drilling, I certify that I am more than 18 years of age, and I served a copy of the Objection to Debtor's Motion Seeking Extension of Exclusivity for Time to File Plan and Disclosure Statement

- (a) on this date: October 11, 2010
(b) by this method: First Class Mail
(c) on the following parties there were not served electronically by the Court:

Delicia Eaves
216 CR 1005
Center, TX 75935

Larry J. Eaves
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Mark Morris
Evergreen Tank Solutions
711 W. Bay Area Blvd., Ste. 560
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Heath Nutt
Little Nutt Oil Co.
344 Klondike St.
Carthage, TX 75633

Anthony W. Price
Shreveport Mack Sales, Inc.
P.O. Box 5857
Bossier City, LA 71171

John Coggin
P.O. Box 292
Seabrook, TX 77586

I certify under penalty of perjury that this is true.

Dated: October 11, 2010.

/s/ David L. Pybus

David L. Pybus

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